

Dkt. No. 26 at p. 26. However, the job description for a “call center customer service representative” containing these duties was posted on March 7, 2022, Exh. 1 to Declaration of Casimir Wolnowski (May 1, 2023), Dkt. No. 31, at WV000186. That was more than a year after the date Plaintiff’s job offer was rescinded, and notably, nearly eight months after the present lawsuit was filed. Significantly, the terms “crucial member,” “key liaison,” and “voice of World Vision” do not appear in the job posting for which Plaintiff applied. This alone undermines Defendant’s argument that the job for which it hired Plaintiff qualifies for the ministerial exception.

Although not dispositive, the amount of time an employee spends on secular versus religious duties is relevant to whether that employee falls within the ministerial exception. *Hosanna-Tabor*, 565 U.S. at 194. Here, it is undisputed that Plaintiff would have spent most of her time performing secular customer service duties. Moreover, of the 13 enumerated components of the job description, 11 are entirely secular. Only a handful of duties even touch-upon religion:

Help carry out our Christian organization’s mission, vision, and strategies. Personify the ministry of World Vision by witnessing to Christ and ministering to others through life, deed, word and sign;

Keep Christ central in our individual and corporate lives. Attend and participate in the leadership of devotions, weekly Chapel services, and regular prayer; and,

Be sensitive to Donor’s needs and pray with them when appropriate.

The first two religious aspects of the customer service representative position were equally applicable to every other employee of World Vision. As for the third, it is undisputed that praying with donors was not a job requirement of the customer service representative position.

## **2. All World Vision Employees Must Participate in Chapel Services**

All World Vision employees are expected to participate in chapel services. All staff members regularly participate in “prayer activities,” Dkt. No. 26 at p. 25. An entire workday is set aside each year for prayer which *all* staff must attend. Dkt. No. 28, at ¶ 26. Freiberg’s declaration states that a guidebook (which is referred to as the “Orange Book”) is made available to all employees of World Vision upon hire and its purpose is to help employees “better understand, comply with, and carry